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August 21, 2015

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

> Re: *The Republic of Kazakhstan v. Does 1 – 100 (Inclusive),* **Civil Action No. 1:15-cv-01900-ER – Cross-Motion for Expedited Discovery**

Dear Judge Ramos:

We represent plaintiff The Republic of Kazakhstan ("Plaintiff"). On July 14, 2015, counsel for Plaintiff and Respublika appeared before this Court for a pre-motion conference requested by Respublika. The court set down a briefing schedule for Respublika's motion. Respublika timely filed its motion papers on August 4. Plaintiff's opposition papers are due August 25, and will be timely filed.

At the conference, we indicated that as part of its opposition to the motion, Plaintiff intends to request that discovery take place prior to the Court's ruling on the motion. (Tr. pp. 13-14, 18.) (I had previously raised the issue of discovery on June 19 in a call with Mr. Rosenfeld, counsel for Respublika.) As we prepare our August 25 opposition, we believe that procedurally it would be appropriate for Plaintiff to cross-move for expedited discovery. Accordingly, we write to inform the Court that Plaintiff proposes to file such a cross-motion on August 25.

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We are available for a further conference if the Court so wishes.

Respectfully,

Jacques Semmelman

cc: James Rosenfeld, Esq. (counsel for Respublika) (via email)
        David Greene, Esq. (via email)